



Answer from BSTOR SA/NV to the public consultation on the proposal of exemption from the obligation to procure upward and downward balancing capacity for aFRR separately

BSTOR SA/NV ("BSTOR") welcomes the opportunity given by Elia to provide feedback and would like to thank Elia for their efforts to provide clarity and transparency on the proposal.

Please find below BSTOR contribution to the consultation. This answer can be considered as non-confidential.

1 BSTOR

BSTOR SA/NV is the battery storage assets origination, development, financing and operation vehicle from Ackermans & van Haaren, the SRIW-Environnement and Bruno Vanderschueren.

BSTOR owns 75% of ESTOR-LUX SA, the « Special Purpose Vehicle » owner of the ESTOR-LUX project in Bastogne (10MW / 20MWh), Belgium's first battery park connected to the high voltage grid.

BSTOR aims to develop a pipeline of at least 150 MW of storage battery capacity, established on several sites, with the objective of concluding the financial close by 2024 and ensuring its commissioning by 2026.

2 Answer to the consultation

In general, BSTOR strongly supports the principles of asymmetric procurement of ancillary services, and more widely of all principles fostering a technology-neutral level playing on those markets.

On the specific case of aFRR in Belgium, a long interactive process involving the TSO, the NRA and all stakeholders had led to a widely supported consensus on a roadmap to implement such level-playing field within a reasonable timing and with reasonable impact on the procurement costs. The latter consensus includes maintaining symmetrical procurement for a share of the procured volume that will fade out with time and with the emergence of liquidity on the market.

However, we request this to be the last exemption period in order to finally reach compliancy with the EBGL and the Clean Energy Package thereafter, stating that services should be non-discriminating and technology neutral and that procurement of upwards and downwards capacity should be carried out separately.

We therefore wish to express our support to the exemption request made by Elia, but we call for a fully EBGL/CEP compliant procurement process as from 2028, and more urgently, for a roadmap to reach such compliancy.